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**HON. GREGORY WOODS**

United States District Judge  
Hon. Stewart Aaron  
United States Magistrate Judge  
United States District Court  
500 North Pearl Street, Room 2260  
New York, NY 10007

April 14, 2022

Re: *United States of America and States of the United States, ex rel. Donohue v. Richard Carranza*  
USDC Case No. 1:20-cv-5396 (GHW)

Dear Hon. Judges Woods & Aaron:

This firm represents the San Diego Unified School District (“SDUSD”) and Dr. Lamont Jackson in his official capacity as Superintendent in the above-captioned case. Pursuant to your Honor’s Individual Rules of Practice for Civil Cases, we submit this letter to request a joint pre-motion conference and to join the briefing schedule proposed by Counsel for Mr. Joseph Willey for Defendants’ Motions to dismiss for the reasons stated therein. (See Doc. 123 & 126)

San Diego Unified School District and Dr. Lamont Jackson have previously requested one extension of time until April 15, 2022 to respond to plaintiff-relator’s Second Amended Complaint (Doc. 19). We are currently in the process of applying for Pro Hac Vice admission to the SDNY in order to file moving papers. By making this request, neither SDUSD, nor Dr. Jackson submit to jurisdiction or waive any arguments against jurisdiction of this Court.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Whitney N. Antrim".

Whitney N. Antrim  
SLS:WNA:jm